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January 2, 2013

***Via Electronic Filing  
and Courtesy Copy Via Federal Express***

Hon. Madeline Cox Arleo  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Illinois National Insurance Company v. Wyndham Worldwide Operations, Inc., et al.*, Case No. 2:09-cv-01724  
Our File No.: 02331-085411

Dear Judge Arleo:


Pursuant to the hearing held on December 10, 2012, the parties have met and conferred regarding dates for depositions of the remaining Wyndham personnel within counsel's control. In furtherance of Your Honor's instructions, we submit this letter setting forth the agreed-upon dates for the depositions so that Your Honor may so-order them. They are as follows:

<u>Deponent</u>	<u>Date</u>
Stephen Barron	January 24, 2013, 10:00 a.m.
Anne Morrison	January 25, 2013, 10:00 a.m.
30(b)(6)/Marcus Banks	January 29-30, 2013, 10:00 a.m.

Wyndham has confirmed that it is unable to voluntarily produce James Iervolino for deposition. We will therefore endeavor to secure his deposition through a subpoena. If we require additional time for this process, we will advise the Court, as Your Honor suggested during the December 10<sup>th</sup> hearing.

Respectfully submitted,

**SO ORDERED:**

  
Andrew T. Houghton  
Sedgwick LLP

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HON. MADELINE ARLEO  
UNITED STATES MAGISTRATE JUDGE

cc: Michael David Lichtenstein, Esq. (via ECF)  
Eric Jesse, Esq. (via ECF)

DATE: \_\_\_\_\_